

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re: :
: Chapter 13
MELVIN CHAPPELL, JR., and, :
CHARLENE D. GRACE-CHAPPELL, : Bankruptcy No. 19-11245 (MDC)
: Debtors. :
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**THE CITY OF PHILADELPHIA'S
REMOTE WITNESS AND EXHIBIT LIST**

The Water Revenue Bureau ("WRB"), hereby submits this Remote Witness and Exhibit List related to the hearing on Debtors' Objection to Proof of Claim Nos. 12 and 13 currently scheduled for Friday, August 28, 2020 at 10:30 a.m.

WITNESS

1. Derrick Segers
Water Field Customer Services Manager
Philadelphia Water Department
Jefferson Towers
1101 Market St.
Phila, PA 19107 Suite 6
Office - 215-685-6311
Derrick.segers@phila.gov

Mr. Segers is expected to testify in support of the WRB's proofs of claim including, but not limited to, rebutting evidence presented by the Debtors that overcomes the *prima facie* validity of the claims, if any. Mr. Segers of the Philadelphia Water Department ("PWD") will testify regarding the HELP Loan program, the HELP Loan obtained by the Debtors, the PWD's record keeping with respect to the Debtors' HELP Loan and PWD's Regulations and Rates.

It is anticipated that Derrick Segers will testify from a home office or City of Philadelphia office location. Counsel and Mr. Segers will not be in the same location. Counsel will appear from

a City of Philadelphia Office. Mr. Segers will not have access to any documents other than those identified by the Debtor and WRB.

The WRB reserves the right to examine any witnesses identified by the Debtors.

EXHIBITS

- WRB-1: Proof of Claim No. 12 and All Exhibits Attached Thereto
- WRB-2: Proof of Claim No. 13 and All Exhibits Attached Thereto
- WRB-3: Cityworks Report Water in Cellar
- WRB-4: Notice of Defect Water in Cellar
- WRB-5: Work Order Water in Cellar
- WRB-6: Cityworks Report Broken Pipe
- WRB-7: Notice of Defect Broken Pipe
- WRB-8: Broken Pipe Work Order
- WRB-9: Case ID 3053906 HELP Loan (29 pages)
- WRB-10: Water/Sewer Account Statement 5011 Saul St.
- WRB-11: Water/Sewer Account Statement HELP Loan
- WRB-12: Stormwater Bill 5014R Leiper St.
- WRB-13: No Meter Status 5014R Leiper St.

The WRB reserves the right to rely upon any exhibits identified by the Debtors in this matter on direct or rebuttal.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: October 22, 2020

By: /s/ Megan N. Harper
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